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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND AD HOC COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS
EXTENDING TIME TO RESPOND TO
MOTION OF THE AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS TO TERMINATE THE
DEBTORS' EXCLUSIVE PERIODS
PURSUANT TO SECTION 1121(d)(1) OF
THE BANKRUPTCY CODE**

Re: Dkt. No. 2741

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Ad Hoc Committee
4 of Senior Unsecured Noteholders (the “**Noteholders Committee**”), on the other. The Debtors
5 and the Noteholders Committee are referred to in this Stipulation and Agreement for Order
6 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as
7 follows:

8 **RECITALS**

9 A. On July 11, 2019, the Noteholders Committee filed the *Motion of Ad Hoc*
10 *Committee of Senior Noteholders to Terminate the Debtors’ Exclusive Periods Pursuant to*
11 *Section 1121(d) of the Bankruptcy Code* [Dkt. No. 2741] (the “**Noteholders Motion to**
12 **Terminate Exclusivity**”), which is set for a hearing before the Court at 9:30 a.m. on July 24,
13 2019. Any response or opposition to the Noteholders Motion to Terminate Exclusivity is due by
14 4:00 p.m. (Pacific Time) on July 17, 2019.

15 B. Counsel for the Debtors has requested, and counsel for the Noteholders
16 Committee has agreed, that the time for the Debtors to respond to the Noteholders Motion to
17 Terminate Exclusivity be extended.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
22 **THAT:**

23 1. The time for the Debtors to file and serve any response or opposition to the
24 Noteholders Motion to Terminate Exclusivity is extended through 4:00 p.m. (Pacific Time) on
25 July 18, 2019.

26 *[Signatures on next page]*
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Dated: July 12, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim
Jane Kim

*Attorneys for Debtors
and Debtors in Possession*

Dated: July 12, 2019

AKIN GUMP STRAUSS HAUER &
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/s/ Ashley Vinson Crawford
Ashley Vinson Crawford

*Attorneys for Ad Hoc Committee of Senior
Unsecured Noteholders*